

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MARYLAND

UNITED STATES

v.

SEAN SULLIVAN

Defendant

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Case No. JRR-23-0257 [SEALED]

UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

Sean Sullivan, the Defendant, by and through undersigned counsel, moves this Court to modify the terms of his pretrial release to permit him to retrieve his passport from the Clerk's Office and to travel to Thailand, France, and Switzerland, from November 2, 2023, until November 24, 2023. The Court has previously approved Mr. Sullivan's similar requests related to international travel, and neither the government nor Pretrial Services objects to this request. In support thereof, Mr. Sullivan states the following:

1. On March 31, 2021, Mr. Sullivan made his initial appearance before this Court on a criminal complaint charging him with unlawful importation of a firearm into the United States. *See United States v. Sullivan*, ADC-21-0884, ECF No. 6.
2. On the same day as his initial appearance, Mr. Sullivan was released on conditions pending trial in this matter. *Id.* at ECF No. 10.
3. On September 15, 2023, Mr. Sullivan made his initial appearance before this Court on an indictment based on substantially the same allegations that formed the basis for the criminal complaint. Mr. Sullivan has remained released in this matter and is subject to the same conditions of release that were imposed in March 2021.

4. Since Mr. Sullivan's release in this matter more than 2.5 years ago, Pretrial Services has not noted any alleged violations of Mr. Sullivan's release conditions.
5. Germane to this motion, Mr. Sullivan's pretrial release conditions provide that he must surrender any passport to the Clerk's Office and obtain no passport. His release conditions do not otherwise restrict his travel.
6. Mr. Sullivan is employed by B&T USA, the American arm of the Swiss firearms company B&T AG, and his proposed international travel is related to his employment.
7. Specifically, Mr. Sullivan requests to retrieve his passport from the Clerk's Office and to travel to the Defense & Security Asia Trade Show in Thailand from November 4 through November 10, customer meetings with the Royal Thai Police and dealers from November 11 through November 14, the Milipol Paris Trade Show in France from November 15 through November 17, and meetings with B&T AG in Switzerland from November 19 through November 23.
8. Mr. Sullivan would depart the United States on a flight on November 2, 2023, and he plans to return to the United States on November 24, 2023.
9. The Court has previously granted Mr. Sullivan's requests to travel internationally related to his employment, including by approving requests to travel to these same trade shows and for meetings at B&T AG in Switzerland. *See United States v. Sullivan*, ECF-21-0884, ECF No. 17 (travel to Brazil and Canada); ECF No. 21 (travel to Switzerland); ECF No. 25 (travel to the Milipol Paris Trade Show in France); ECF No. 29 (travel to Switzerland); ECF No. 35 (travel to Germany and Malaysia); ECF No. 39 (travel to Malaysia); ECF No. 43 (travel to Switzerland

and Brazil); ECF No. 48 (travel to Switzerland and to the Defense & Security Trade Show in Thailand).

10. Mr. Sullivan requests that a member of the Office of the Federal Public Defender be permitted to retrieve Mr. Sullivan's passport from the Clerk's Office on or after October 23, 2023, and subsequently provide it to him. He proposes to return his passport to the Clerk's Office within three business days of November 27, 2023.
11. Assistant United States Attorney Michael Cunningham does not oppose Mr. Sullivan's request.
12. Likewise, U.S. Probation Officer Erin Thumma has no objection.

Wherefore, Mr. Sullivan asks that this Court modify the conditions of his release to permit him to retrieve his passport from the Clerk's Office and to travel to Thailand, France, and Switzerland, from November 2, 2023, until November 24, 2023.

Respectfully submitted,
James Wyda
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for the District of Maryland

/s/
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